

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

JANIE L. KINSEY and C.H. KINSEY,)
)
Plaintiffs,)
)
v.) Case No.: 2:05CV 636-F
)
C. LANCE GOULD, et al.,)
)
Defendants.)

MOTION FOR EXTENSION OF TIME TO ANSWER COMPLAINT
AND ANY AMENDMENTS THERETO

COMES NOW Defendant C. Lance Gould, by and through the undersigned counsel, and hereby requests an extension of time (to August 17, 2005) to answer the Complaint of the Plaintiffs and any amendments thereto. As grounds, this Defendant states as follows:

1. The Plaintiffs have filed a Complaint alleging a violation of their civil rights.
2. This Court on July 13, 2005 ordered the Plaintiffs to file an amended complaint on or by July 28, 2005 and to set forth the Plaintiffs' claims with more specificity.
3. Because this Defendant, like the Court, cannot readily discern the nature of the Plaintiffs' claims and requested relief from the currently filed Complaint, this Defendant requests an extension of time in which to respond to the Plaintiffs' Complaint and any amendments filed as required by the Court's July 13,

2005 Order. In particular, this Defendant requests that it be allowed until August 17, 2005 to respond to the Complaint and any amendments thereto.

WHEREFORE, Defendant C. Lance Gould respectfully requests that his motion for an extension of time be granted.

/s/ R. Austin Huffaker, Jr.
Bar Number: (ASB-3422-F55R)
Robert C. ("Mike") Brock
Bar Number: (ASB-5280-B61R)

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Attorneys for Defendant
C. LANCE GOULD

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing upon:

Janie L. Kinsey
C.H. Kinsey
420 County Road 250
Headland, AL 36345

by placing same in the United States Mail, postage prepaid and properly addressed on this the 22nd day of July, 2005.

/s/ R. Austin Huffaker, Jr.
Of Counsel